

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)
Plaintiff)
)
v.) Case No.PJM 08 cv 0921
)
WORLD AVENUE USA, LLC, et al.)
Defendants)
)

DECLARATION OF FIDEL DHANA

I, FIDEL DHANA, hereby declare as follows:

1. My name is Fidel Dhana. I am over eighteen (18) years of age. The facts set forth in this Declaration reside within my personal knowledge.

2. I am currently employed by Selling Source, LLC. My immediate prior employer was Defendant World Avenue Holdings, LLC, which is the parent entity to the Defendant World Avenue USA, LLC in this case. I have knowledge of NiuTech, LLC and World Avenue Holdings, LLC since joining World Avenue Holdings, LLC as Vice President of Finance and Corporate Controller in May 2006.

3. By making this Declaration, I do not intend to waive the attorney-client privilege, work product protection, or other protections on behalf of any company.

4. I have recollection of two investigations by the Florida and Texas Attorney Generals. The check for the settlement of those two investigation was cut on behalf of World Avenue USA, LLC because that is the entity name that appeared on the Assurance of Voluntary Compliance that the accounting department received as support for the payments.

I hereby declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

November 19, 2010.



FIDEL DHANA